Terry Calvani (53260) terry.calvani@freshfields.com Richard Snyder (*pro hac vice*) rich.snyder@freshfields.com FRESHFIELDS BRUCKHAUS DERINGER US LLP 701 Pennsylvania Avenue, NW, Suite 600 Washington, DC 20004

Tel: (202) 777-4500 Fax: (202) 777-4555

Counsel for Defendant Beijing Matsushita Color CRT Co., Ltd.

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  ANTITRUST LITIGATION  )	Case No.: 3:07-cv-5944 SC MDL NO. 1917
This document relates to:  Costco Wholesale Corp. v. Hitachi, Ltd., et al.  Case No. 3:11-cv-06397-SC	STIPULATION AND [PROPOSED] ORDER DISMISSING DEFENDANT BEIJING MATSUSHITA COLOR CRT CO., LTD.
	Judge: The Honorable Samuel Conti

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the undersigned Plaintiff and Defendant Beijing Matsushita Color CRT Co., Ltd. ("BMCC") as follows:

- 1. The First Amended Complaint filed by Plaintiff Costco Wholesale Corporation ("Costco") in the above-captioned action and all claims asserted therein by Costco against BMCC are dismissed, without prejudice, pursuant to Rule 41(a) of the Federal Rules of Civil Procedure; and
  - 2. BMCC's Motion to Dismiss [MDL Dkt. 2118] is withdrawn as to Costco; and
  - 3. The parties will bear their own attorneys' fees and costs.

4. The undersigned parties respectfully request that the Court enter this Stipulation as an Order.

## IT IS SO STIPULATED.

Dated: November 13, 2013

## FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: /s/ Richard S. Snyder
Terry Calvani (53260)
terry.calvani@freshfields.com
Richard Snyder (pro hac vice)
rich.snyder@freshfields.com
701 Pennsylvania Avenue NW, Suite 600
Washington, DC 20004
T: (202) 777-4500
F: (202) 777-4555

Attorneys for Defendant Beijing Matsushita Color CRT Co., Ltd.

Dated: November 13, 2013 PERKINS COIE LLP

By: /s/ David J. Burman
David J. Burman (pro hac vice)
dburman@perkinscoie.com
Cori G. Moore (pro hac vice)
cgmoore@perkinscoie.com
Eric J. Weiss (pro hac vice)
eweiss@perkinscoie.com
Nicholas H. Hesterberg (pro hac vice)
nhesterberg@perkinscoie.com
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
T: (206) 359-8000
F: (206) 359-9000

Joren S. Bass (208143) jbass@perkinscoie.com Four Embarcadero Center, Suite 2400 San Francisco, CA 94111-4131 T: (415) 344-7120 F: (415) 344-7320

Attorneys for Plaintiff Costco Wholesale Corporation Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: December 11, 2013

Honorable Samuel Conti

United States District Court Judge